

# Exhibit Q

**DECLARATION OF KRISTIE HUFF**

I, Kristie Huff, pursuant to 28 U.S.C. § 1746, do hereby swear and affirm under penalty of perjury as follows:

1. The facts stated in this Declaration are true and correct and are based on my personal knowledge. I am over eighteen years of age and under no legal disability. I am providing this statement voluntarily without any threat or promise of reward having been made to me.
2. My name is Kristie Huff. I currently serve as the Human Resources Business Partner for MHM Health Professionals, LLC (“MHMHP”).
3. My role involves managing the Human Resources aspect in the state of Mississippi.
4. When an employee’s employment is terminated, I usually complete a Termination Report.
5. I completed an Involuntary Termination Report for Dr. Amy Woods on July 2, 2019.
6. Dr. Woods’s employment contract was at-will.
7. As part of employees’ continued employment, access to the correctional facilities must be maintained.

8. As part of Dr. Woods's employment contract, she was required to obtain and maintain facility access privileges at the correctional facility to which she was assigned.

9. MHMHP does not control, grant, or revoke access to the facilities.

10. On or about June 26, 2019, I received a forwarded email from Travis Day. The content of the email concerned Dr. Amy Woods's access/security clearance to Marshall County Correctional Facility ("MCCF").

11. The email relayed that, effective June 26, 2019, Dr. Woods no longer possessed security clearance to enter or access MCCF.

12. As a result of Dr. Woods's security clearance being revoked, Dr. Woods's employment was terminated effective June 28, 2019.

13. The reason for Dr. Woods's employment termination was that she could not access MCCF.

14. I did not have knowledge that anyone asked Dr. Woods to deny prisoners care or otherwise violate their Eighth Amendment rights guaranteed by the United States Constitution.

15. The sole reason I terminated Dr. Woods's employment was that she did not possess the security clearance necessary to enter MCCF.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 11 day of March, 2020.

  
Kristie Huff

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